

### **REMARKS**

Claims 1-38 are pending in the application. Claims 1-33 were rejected under 35 U.S.C. § 112, second paragraph. All the claims were also rejected as obvious over U.S. Patent No. 6,381,590 to Debois ("Debois") in view of U.S. Patent No. 5,812,400 to Eddy et al. ("Eddy"), and/or in further view of U.S. Patent No. 5,689,098 to Gillerion ("Gillerion"), U.S. Patent No. 6,151,591 to Pierce et al. ("Pierce"), or U.S. Patent No. 5,590,198 to Lee et al. ("Lee").

Claims 34-42 are new. No new material has been added.

Applicants thank the Examiner for consideration of the references listed on the Information Disclosure Statement filed October 3, 2005.

#### **Debois does not teach or suggest information assigning a device to operate in an operational application environment**

Claim 1 recites in relevant part "storing information **assigning said device** to operate in an initial individual **operation application environment**." Claims 14 and 15 recite in relevant part "relating said identifier to an **initial application environment**." The Examiner asserted that these elements are taught by Debois at col. 5, lines 6-12 and col. 6, lines 12-65, respectively. This is incorrect. The cited passages merely describe a postage meter (col. 5, lines 6-12) that can check lines of credit before providing postage (col. 6, lines 12-65). There is simply no teaching or suggestion in Debois that the postage metering system should store information assigning the system to an **application environment**.

The Examiner further asserted that the limitation in claim 14 reproduced above may be read as "to assign a task to a particular resource, one must first (and trivially) identify which resource is to be used." Office Action, p. 4. The Examiner took Official Notice that "such task assignment was old and well known at the time of the invention." Applicants respectfully submit that this reading of claim 14 is incorrect. An "application environment" is not the same as a "task assignment." For example, the Examiner asserts that it was known "to specifically identify computer resources for task assignment." Office Action, p.5. It is unclear what relationship this has to the present claims, which recite relating an identifier of a device to an application

**environment**, not merely assigning a task to a resource. Applicants respectfully request that the Examiner provide evidence supporting the Official Notice taken, and showing how such “task assignment” is equivalent to or reads on relating an identifier to an application environment as recited in the claims.

Finally, the Examiner stated that it would have been obvious to one of skill in the art to modify Debois to include “identification for reconfiguring for task assignment” to “avoid ambiguities in the task management process.” Office Action, p. 5. It is unclear to what “task management process” the Examiner refers. The claims recite allocating a device to operate in an **application environment**, as previously described. The Office Action does not provide a motivation for one of skill in the art to modify Debois as suggested, since “avoiding ambiguities in the task management process” is unrelated to allocating a device to an application environment.

For at least the reasons given above, independent claims 1, 14 and 15 are allowable over the cited art. Dependent claims 2-13 and 16-33 are allowable for at least the reasons given above with respect to the independent claims. Withdrawal of the rejections and reconsideration of the claims is respectfully requested.

**Eddy does not teach or suggest assigning a device to a new external application environment**

Claim 1 recites in relevant part “a first communications interface for changing said information so as to assign said device to a new remotely located **external application environment** for servicing the device.” The Office Action asserted that this limitation was disclosed by Eddy at col. 6, lines 7-50. However, this passage only describes changing the postal code region of an external accounting system. There is no teaching or suggestion that the device may be assigned or reassigned to an **application environment** as recited in the claims. As described throughout the specification, an application environment may include, for example, a specific customer, a function set of the device, or other information. In a specific example, the application environment may be a personal computer. *See, e.g.*, specification pp. 10-11. There is simply no teaching or suggestion in Debois or Eddy that this type of information should be

associated with an identifier of the device. Withdrawal of the rejection and reconsideration is requested.

**Gillerion, Pierce, and Lee do not remedy the defects of Debois and Eddy**

Several of the independent claims were rejected as obvious over Debois in view of Gillerion, Pierce, and/or Lee. However, none of these references remedy the defects of Debois and Eddy as previously described. Specifically, none of the references teach or suggest allocating a device to an application environment based on an internally stored identifier.

**35 U.S.C. § 112 Rejections**

Claims 1-33 were rejected as indefinite for failing for particularly point out and distinctly claim the subject matter which applicants regard as the invention. Specifically, the Examiner stated that the phrase “wherein the internally stored identifier is readable by an external system” was unclear. Although Applicants respectfully disagree with this characterization, the independent claims have been amended to clarify these limitations. Withdrawal of the rejection and reconsideration is respectfully requested.

Claim 6 was rejected under 35 U.S.C. §112. The Examiner stated that the phrase “personal computer bus protocols” describe protocols that “change over time” and is therefore indefinite. Office Action, p. 2. Applicants respectfully disagree. Although the specific computer bus protocols in general use at a specific point in time may be different than those in general use at another point in time, this does not render the claim indefinite. The meaning of the phrase “computer bus protocols” is readily apparent to one of ordinary skill in the art at any given point in time. Such protocols are widely known and clearly specified. The Examiner asserted that Applicants provided “no evidence of standardization or specification of such protocols.” Applicants respectfully submit that it is widely known in the art that computer bus protocols are subject to industry standardization and specification. Indeed, these protocols would be useless without such standardization. One of skill in the art could easily interpret the phrase “computer bus protocols” to understand the metes and bounds of the claim. *See* M.P.E.P. § 2173.02. The claim therefore is not indefinite. Withdrawal of the rejection and reconsideration is respectfully requested.

Claim 9 was rejected under §112 due to a lack of antecedent basis for the phrase "the printing function." The claim has been amended to provide a correct antecedent basis. Withdrawal of the rejection is respectfully requested.

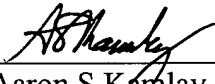
**Conclusion**

Based on the above remarks, Applicants believe the claims are in condition for allowance. The Commissioner is authorized to charge any fees or credit any overpayment to the deposit account of Kenyon & Kenyon LLP, Deposit Account No. 11-0600.

The Examiner is invited to contact the undersigned to discuss any matter concerning this application.

Respectfully submitted,

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